EXHIBIT A

From: <u>Jeffrey L. Haberman</u>

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Jonathan R. Gdanski; Megan L. Barrett

Subject: SERVICE OF COURT DOCUMENTS

Date: Friday, August 25, 2023 4:51:24 PM

Attachments: <u>image001.png</u>

Dear Counsel:

In this link you will find the material required to be produced pursuant to MDL CMO 17 and JCCP CMO 15 for our clients who have opted out of the settlement.

SLO Opt Out Clients' Document and Record Production

In addition, we write to notify you that we will be moving the Court to lift the stay of discovery as to Walker McKnight so that we can take his deposition and preserve his testimony. Mr. McKnight underwent a double lung transplant and a kidney transplant in April 2022 as a result of injuries he sustained that were caused by Juul. Time is of the essence to preserve Walker's testimony. We seek to take this deposition at the end of September. Please let us know by COB on Monday, August 28th if you'll agree to our noticing his deposition without Court intervention.

Please note we served the designated email addresses provided in the MDL and JCCP orders, let us know if additional counsel should be served.

Sincerely yours,

Jeff Haberman

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